

## SETTLEMENT TERMS

23. To resolve this matter, the State and Defendants agree to the following settlement terms, and the Court so orders:

- a. Dominic Bohnett and TCA VOIP shall comply with the Vermont Consumer Protection Act (9 V.S.A., Chapter 63), Telemarketing and Consumer Fraud and Abuse Prevention Act (15 U.S.C., Chapter 87), Telemarketing Sales Rule (16 C.F.R. Part 310), Telephone Consumer Protection Act (47 U.S.C. § 227), and all provisions of this Stipulated Judgment.
- b. The terms of this Stipulated Judgment shall apply to Dominic Bohnett, TCA VOIP, its successors and assigns for a period of six years from the date of signing.
- c. Within five (5) business days of the Court's approval and issuance of this Stipulated Judgment, Dominic Bohnett and TCA VOIP shall pay a combined total of \$125,000 to the State of Vermont and the Social Security Administration by wired bank transfer (subject to adjustment and allocation between these agencies pursuant to paragraph 26(c) below).
- d. At the time of the payment in subparagraph 23(c), above, Dominic Bohnett and TCA VOIP will immediately cease and desist acting as